

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

DENISE L. JOHNSON,)	
)	
Plaintiff,)	
)	
v.)	Case No. 4:17-CV-2802
)	
SPECIAL SCHOOL DISTRICT OF ST.)	
LOUIS COUNTY, et al.,)	
)	
Defendants.)	

DEFENDANT’S MOTION TO DISMISS

COMES NOW Defendant Special School District of St. Louis County (“Defendant”) and respectfully moves the Court, pursuant to Federal Rule of Civil Procedure 12(b)(6), to dismiss the Complaint filed by Plaintiff Denise L. Johnson (“Plaintiff”), including each of Plaintiff’s nine claims for (1) Racial Discrimination in Violation of Title VII of the Civil Rights Act of 1964, 42 USC 2000e, et seq.; (2) Age Discrimination in Violation of the Age Discrimination in Employment Act (ADEA) 29 USC 621; (3) Reprisal for Engaging in Protected Activities; (4) Reprisal for Engaging in "Whistleblower" Protected Activity.; (5) Violation of the Rehabilitation act of 1973, 29 USC section 710 et seq; (7)¹ Intentional Infliction of Emotional Distress; (8) Negligent Infliction of Emotional Distress; (9) Tortious Interference with a Business Expectancy; and (10) Willful and Wanton, for failure to state a claim upon which relief can be granted.

The bases for the instant Motion are set forth in detail in the Memorandum in Support of Defendant’s Motion to Dismiss, which Defendant files contemporaneously herewith and incorporates by reference into this Motion.

WHEREFORE Defendant Special School District of St. Louis County respectfully requests that the Court enter an Order dismissing with prejudice Plaintiff Denise L. Johnson's Complaint and granting any further relief the Court deems just and proper.

Respectfully submitted,

BRYAN CAVE LLP

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**Attorneys for Defendant Special School
District of St. Louis County, Missouri**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served via the Court's electronic filing system on January 11, 2018, and will be served by regular U.S. Mail, postage prepaid, on the 12th day of January 2018, on the following:

Denise L. Johnson
719 Avondale Dr.
St. Peters, Missouri 63376

Pro-Se Plaintiff

/s/ Travis R. Kearbey

¹ Plaintiff erroneously failed to include a sixth claim in the Complaint.